

1 HEATHER E. WILLIAMS, CA Bar #122664
Federal Defender
2 CHRISTINA M. CORCORAN, CA Bar #344683
Assistant Federal Defender
3 Office of the Federal Defender
2300 Tulare Street, Suite 330
4 Fresno, CA 93721-2226
Telephone: (559) 487-5561
5 Fax: (559) 487-5950

6 Attorneys for Defendant
VINCENT ELLIOT PORTER
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 VINCENT ELLIOT PORTER,

15 Defendant.
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Case No. 1:22-cr-00113-JLT-SKO

**STIPULATION FOR CONTINUANCE OF
TRIAL DATE; ORDER**

Date: April 22, 2025

Time: 8:30 a.m.

Judge: Hon. Jennifer L. Thurston

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Jeffrey Spivak, counsel for plaintiff, and Assistant
19 Federal Defender Christina M. Corcoran, counsel for Vincent Elliot Porter, that the Court may
20 continue the jury trial currently scheduled for October 8, 2024, at 8:30 a.m. until April 22, 2025,
21 at 8:30 a.m. The parties make this request for the following reasons:

22 1. The government has produced voluminous discovery in this case, consisting of
23 46,844 Bates-marked pages. The government produced supplemental discovery on July 24,
24 2024, consisting of 1,717 Bates-marked pages.

25 2. Defense counsel requires time to review discovery, conduct necessary
26 investigation, and prepare for trial.

27 3. Furthermore, in the last month, the parties learned that two witnesses passed
28 away, which raises significant new potential evidentiary and legal issues that the parties need to

1 navigate and potentially resolve.

2 4. Defense counsel further believes this case may require significant briefing on
3 motions prior to trial, which may be further complicated by these recent developments.

4 5. In light of the complex nature of the case, the voluminous discovery, and the
5 recently emerged legal and factual issues, the parties believe that continued time for plea
6 negotiations and/or potential litigation is necessary and would serve the interest of judicial
7 economy.

8 6. Defense counsel believes that failure to grant the above-requested continuance
9 would deny her the reasonable time necessary for effective preparation, taking into account the
10 exercise of due diligence.

11 7. The government joins the request for a continuance for the aforementioned
12 reasons.

13 8. Based on the above-stated findings, the ends of justice served by continuing the
14 case as requested outweigh the interest of the public and the defendant in a trial within the
15 original date prescribed by the Speedy Trial Act.

16 9. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
17 *et seq.*, within which trial must commence, the time period of October 8, 2024, to April 22, 2025,
18 inclusive, is excludable pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

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IT IS SO STIPULATED.

Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

Date: August 28, 2024

/s/ Jeffrey Spivak
JEFFREY SPIVAK
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: August 28, 2024

/s/ Christina M. Corcoran
CHRISTINA M. CORCORAN
Assistant Federal Defender
Attorney for Defendant
VINCENT ELLIOT PORTER

ORDER

IT IS SO ORDERED. The jury trial currently scheduled for October 8, 2024, at 8:30 a.m. is hereby vacated and reset for a jury trial on April 22, 2025, at 8:30 a.m. For the reasons set forth in the stipulation, the time period of October 8, 2024, to April 22, 2025, inclusive, is excluded pursuant to 18 U.S. C. § 3161(h)(7)(A) and (B)(iv).

IT IS SO ORDERED.

Dated: **August 28, 2024**

Jennifer L. Thurston
UNITED STATES DISTRICT JUDGE